



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

ZACHARY W. CARTER
Corporation Counsel

KAVIN THADANI
Senior Counsel
Phone: (212) 356-2351
Fax: (212) 356-3509
kthadani@law.nyc.gov

November 8, 2018

VIA ECF

Honorable Cheryl L. Pollak
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Martinez v. City of New York, et al., 1:16-cv-00079-AMD-CLP

Your Honor:

I am a Senior Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney representing defendants in the above-referenced matter. Defendants write to respectfully request an extension of time to complete their production of disciplinary records, from November 9, 2018 to November 21, 2018. Plaintiff consents to this request.

On October 29, 2018, defendants produced, *inter alia*, disciplinary records pertaining to nineteen investigations. In addition, defendants intend to produce, *inter alia*, disciplinary records pertaining to at least an additional forty investigations to plaintiff tomorrow.

However, defendants are still in the process of obtaining records pertaining to approximately thirteen investigations. Accordingly, defendants respectfully request an extension of time, from November 9, 2018 to November 21, 2018, to obtain those documents in order to complete their production of disciplinary records.

Thank you for your consideration.

Respectfully,

/s/ **Kavin Thadani**

Kavin Thadani
Senior Counsel
Special Federal Litigation Division

cc: **BY ECF**
Gabriel Harvis, Esq.
Baree Fett, Esq.
Attorneys for Plaintiff